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all redactions to remove non-responsive information

MAY 09 1983

Mr. John Goetz
Chief, Hazardous Waste Management Section
Kansas Department of Health and Environment
Forbes Field
Topeka, Kansas 66620

RE: Reid Supply
KSD007246846

Dear Mr. Goetz:

Attached are completeness comments resulting from our review of the [REDACTED] and Reid Supply Part B permit applications. Please note that [REDACTED] and the Reid Supply comment letter must be issued by May 29, 1983.

Any questions on these comments can be directed to Karen A. Flournoy of my staff at (816) 374-6531.

Sincerely yours,

Robert L. Morby
Chief, Waste Management Branch
Air and Waste Management Division

Enclosures

bcc: Michael Sanderson, AWC

ARWM/WMBR-PMTS:KFlournoy:lmh:x6531:5-6-83:Disk D78

PMTS

for
Flournoy

Sadeq
5/6/83

PMTS

for
Harrington

Sadeq
5/6/83

WMBR

Morby

Morby
5/6/83



R00001522
RCRA Records Center

General Description of Facility

1. The unit of measure must be included on page 1 of Form 3 of the Part A application included in the Part B. Both Form 1 and Form 3 should be signed by the same individual(s), please refer to 122.6 for signatory requirements.

2. After reviewing the layout map contained in the Part B, the issue comes up of whether the two facilities (areas) are contiguous. The definitions of facility and on-site are outlined below. We request the facility to review the definitions and their operation and provide information in the response as to whether or not the two facilities (areas) are contiguous.

"Facility" means all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them).

"On-site" means the same or geographically contiguous property which may be divided by public or private right-of-way, provided the entrance and exit between the properties is at a cross-roads intersection, and access is by crossing as opposed to going along, the right-of-way. Non-contiguous properties owned by the same person but connected by a right-of-way which he controls and to which the public does not have access, is also considered on-site property.

Topographic Maps

2. The following information must be provided:

- A. A waiver request for the map scale requirements.
- B. Date and source of the wind rose information.

Traffic Patterns

3. The application must address any traffic controls and traffic control signals on-site and along the road between the two areas.

4. The following information must be provided:

- A. The applicable hazardous waste analyses should be performed on all waste streams at least annually. The regulations require that the analysis must contain all information which must be known to treat, store or dispose of the waste in accordance with the regulations. The regulations also include additional requirements for off-site facilities, such as Reid Supply.

- B. The sampling methods must meet the requirements of Part 261, Appendix I, and test methods are discussed in Appendix III of Part 261.

Security Procedures

5. For clarity, the fences and barriers should be shown on the layout map. The location of the "Danger-Unauthorized Personnel Keep Out" signs should also be shown on the layout map.

General Inspection Requirements

6. Inspection of loading/unloading areas should be included in the inspection schedule.
7. The discussion in the application on 264.15(c) requirements should be reworded to include both repairs resulting from an inspection and remedial actions.

Preparedness and Prevention

8. Water at adequate volume and pressure to supply water hoses, automatic sprinklers or water spray systems must be addressed in the application.
9. Is the testing of required equipment, as included in the inspection schedule, a visual inspection only or is the equipment tested on some schedule?
10. How was the aisle space determined to be adequate? Please refer to the latest edition of the National Fire Protection Association's "Flammable and Combustible Liquids Code" for further information on aisle space in areas where ignitable wastes are stored.
11. Have any arrangements been made with state emergency response teams, emergency response contractors and equipment suppliers? If no, the application must explain why.

Contingency Plan

12. The location of the emergency equipment must be shown on the layout map.

Closure

13. The engineer certifying closure should also visit the site during closure. The certification cost must be included in the closure cost estimate.

Tank and Container Standards

14. In order to better understand the facility operation, the application must include a layout map illustrating the locations of all tanks discussed in the Part B and their purpose in the storage and distillation operations and the location(s) of the drum storage area. In order to determine which tanks prior to the distillation unit must be regulated, we will need to review information on the tanks. This information should include a discussion of the movement of wastes and what time of storage, in terms of time, takes place. Also, what is the portable transfer tanker?

15. The application must address in more detail the 264.176 requirement for ignitable waste in containers and the 264.198 requirements for ignitable waste in tanks. If the facility desires to obtain a waiver from these requirements, the waiver must contain more detailed information. The detailed information would include, but not be limited to: layout map illustrating all distances including distance(s) to off-site buildings, discussion on local fire codes and discussion of potential impacts of fire or explosion.

16. We would prefer a concrete containment system.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI - 64106

M. Sanderson
AWCM

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RECEIVED

MAY 10 1983

AIR AND HAZARDOUS MATERIALS
DIVISION

REID SUPPLY
KSD007246846

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